

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OKLAHOMA  
TULSA DIVISION**

**IN RE:** )  
Sanctuary Evangelistic Church, Inc. ) Case No. 12-12616  
 ) Chapter 11  
 )  
**DEBTOR(S)** )

**OBJECTION TO UNITED STATES TRUSTEE'S  
MOTION TO CONVERT OR DISMISS CHAPTER 11 CASE WITH  
NOTICE OF OPPORTUNITY FOR HEARING**

**COMES NOW**, the Debtor, by and through counsel of record, Jerry L. Gunter, and objects to the United States Trustee's Motion to Convert or Dismiss Case with Notice of Opportunity for Hearing filed by the United states Trustee on 12/27/2012.

1. Debtor, Sanctuary Evangelistic Church, Inc., a not for profit Oklahoma corporation operating as a religious organization and church, filed for protection under Chapter 11 of the Bankruptcy Code on September 24, 2012.
2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 157.
3. It is undisputed that the Debtor is a religious institution. It is incorporated in the State of Oklahoma as a Domestic Not for Profit Corporation Church, filing number 1400475931 since February 6, 1989. It's income is derived primarily from donations, it sells no products nor receives any rental income. It is a "corporation that is not a moneyed" per 11 U.S.C.A. § 1112(c) (West). All of its resources are used for the purpose of the not for profit church. It should not be converted due to the nature of the corporation and statutory prohibition.
4. Debtor has had difficulty completing the necessary documents. However, it intends to have all documents filed, including a confirmable plan before the pending hearing.

**WHEREFORE**, Debtor respectfully objects to the United States Trustee's Motion to Convert or Dismiss Case with Notice of Opportunity for Hearing.

Respectfully submitted,

/s/Jerry L. Gunter

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